

REMARKS

Applicants appreciate the continued examination of the current application as evidenced by the Office Action dated October 19, 2007 (the Action). Claims 1-10 are pending. Claims 1-4 and 6-10 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent Application Publication No. 2003/0201982 to Iesaka ("Iesaka") in view of U.S. Patent No. 6,286,064 to King ("King"). Claim 5 has been objected to under 37 C.F.R. 1.75(c) as being in improper form.

Reconsideration is respectfully requested in view of the amendments above and the remarks that follow

Claim 5 is not in improper form under 37 C.F.R. 1.75(c)

Claim 5 stands objected to under 37 C.F.R. 1.75(c) as being in improper form because a multiple dependent claim cannot depend from another multiple dependent claim. Claim 5 is not examined on the merits in the Action.

A Preliminary Amendment filed December 23, 2004 removes the multiple dependencies from the claims and otherwise conforms the claims to U.S. practice. To the extent that the Preliminary Amendment has not been entered, Applicants respectfully request entry of the amendments therein. The current listing of the claims reflects the Preliminary Amendment submitted December 23, 2004.

Accordingly, Applicants request that the objection under 37 C.F.R. 1.75(c) be withdrawn and that Claim 5 be considered on the merits. Because no art has been cited with respect to Claim 5, Applicants submit that Claim 5 is in condition for allowance.

Claims 1-4 and 6-10 are patentable over Iesaka in view of King

Claim 1 recites as follows:

A method of entering text into an electronic device by means of a keypad having a number of keys, each key representing a plurality of characters, the method comprising:

entering characters by means of the keys representing the characters, wherein a character is selected among the plurality of

characters represented by the corresponding key by pressing the key a number of times corresponding to the character.

attaching to each key, in addition to the plurality of characters represented by that key, a further, ambiguous character representing any one of the plurality of characters represented by the key, wherein the plurality of characters and the ambiguous character are concurrently assigned to each key for selection by pressing the key a number of times corresponding to either the ambiguous character or the plurality of characters;

activating a sequence of keys such that an ambiguous character sequence comprising at least one ambiguous character is generated;

generating possible non-ambiguous character sequences corresponding to the ambiguous character sequence;

comparing the possible character sequences with a vocabulary stored in a memory, the vocabulary comprising character sequences representing words occurring in a given language;

pre-selecting ones of the possible character sequences that match character sequences stored in the vocabulary;

selecting one of the pre-selected character sequences; and
entering the selected character sequence into the device.

Claim 6 includes recitations analogous to those of Claim 1. Applicants submit that at least the above underlined recitations are not disclosed or rendered obvious by Iesaka or King. Applicants further note that Claims 1 and 6 have been amended to clarify that the plurality of characters and the ambiguous character are concurrently assigned to each key for selection by pressing the key a number of times corresponding to either the ambiguous character or the plurality of characters. Support for this amendment can be found, for example, on page 11, lines 4-15.

The Action takes the position that Iesaka discloses a keyboard in which a character map of the keys may be changed and the remapped keys may be used to perform any number of functions. The Action concedes that Iesaka does not disclose "that a series of ambiguous keystrokes will result in 'vocabulary.'" See the Action, page 2. The Action cites King as allegedly disclosing this feature. Applicants submit that in addition to the failure of Iesaka to disclose recognizing a series of ambiguous keystrokes as a character sequence stored in a vocabulary, Iesaka also fails to disclose or render obvious that a plurality of characters and an

ambiguous character are concurrently assigned to each key for selection by pressing the key a number of times corresponding to either the ambiguous character or the plurality of characters as recited in independent Claims 1 and 6. This feature is also not disclosed by King.

King proposes a predictive editor method of word selection, which is described in Applicants' specification, *e.g.*, on pages 2-3. In King, a plurality of letters and symbols are assigned to the keys so that the keystrokes on these keys are ambiguous. Accordingly, a keystroke sequence can potentially match more than one word. The keystroke sequence in King is processed by a vocabulary module that matches the sequence to corresponding stored words or other interpretations. Words that match the sequence of keystrokes are presented to the user in a selection list on the display as each keystroke is received. *See* King, col. 3, lines 20-35 (cited in the Action)). Accordingly, the keystrokes in King are apparently all ambiguous, and King does not disclose "entering characters by means of the keys representing the characters, wherein a character is selected among the plurality of characters represented by the corresponding key by pressing the key a number of times corresponding to the character" as recited in the current claims.

As discussed in Applicants' specification on page 11, predictive editors, such as proposed by King, generally cannot handle words that are not found in the vocabulary of the device. It is, therefore, often necessary for a user to switch to a "multi-tap" method or mode in which the keystrokes are not ambiguous, *i.e.*, each key is tapped or pressed a certain number of times to select a specific character. Predictive editors (such as proposed by King) typically require the user to press a specific key sequence or select from a menu in order to change between the two different input modes, which can make the use of predictive editors cumbersome for a user.

In contrast, Claims 1 and 6 recite that the plurality of characters and the ambiguous character are concurrently assigned to each key for selection by pressing the key a number of times corresponding to either the ambiguous character or the plurality of characters. According to embodiments of the current invention, there is no need to switch between a multi-tap mode and a predictive editor mode. This feature is not disclosed or rendered obvious by Iesaka, which the Action concedes does not match ambiguous keystrokes to a

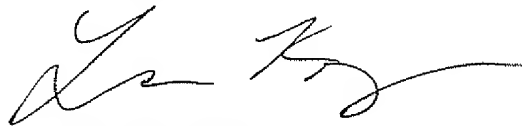
vocabulary, and King, which proposes a predictive editor that does not concurrently assign a plurality of characters and an ambiguous character to a key as recited in Claim 1.

For at least these reasons, Applicants submit that the recitations of independent Claims 1 and 6 are not disclosed or rendered obvious by the art cited in the Action. Claims 2-5 and 7-10 depend from Claims 1 and 6, respectfully, and are patentable at least per the patentability of the claims from which they depend. Withdrawal of the rejections under 35 U.S.C. § 103(a) is respectfully requested.

CONCLUSION

Accordingly, Applicants submit that the present application is in condition for allowance and the same is earnestly solicited. Should the Examiner have any matters outstanding of resolution, he is encouraged to telephone the undersigned at 919-854-1400 for expeditious handling.

Respectfully submitted,



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Joyce Paoli 